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Attorneys for Defendants
WELLS FARGO & COMPANY, WELLS FARGO
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FUNDS TRUST, WELLS FARGO FUNDS
DISTRIBUTOR, LLC, STEPHENS, INC., WELLS
FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RABKIN
A Professional Corporation

ARNOLD KREEK, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY, WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS FARGO FUNDS TRUST, WELLS
FARGO DISTRIBUTORS, STEPHENS, INC.,
WELLS FARGO BANK, N.A.,

Defendants.

No. CV-08-1830 WHA

Action Filed: April 4, 2008

STIPULATION AND [PROPOSED]
SCHEDULING ORDER

1 WHEREAS Plaintiff ARNOLD KREEK Individually and on behalf of all others similarly
2 situated ("Plaintiff") filed a class action complaint captioned *Arnold Kreek v. Wells Fargo &*
3 *Company, et al.*, Case No. CV-08-1830 JSW, on April 4, 2008 alleging that Defendants WELLS
4 FARGO & COMPANY, WELLS FARGO FUNDS MANAGEMENT, LLC, WELLS FARGO
5 FUNDS TRUST, WELLS FARGO FUNDS DISTRIBUTOR, LLC, STEPHENS, INC. and WELLS
6 FARGO BANK, N.A. (collectively, "Defendants") engaged in certain conduct which allegedly
7 violated federal securities laws;

8 WHEREAS certain of the claims arise under the Private Securities Litigation Act of 1995;

9 WHEREAS the undersigned counsel anticipate that motions will be filed to appoint lead
10 plaintiff(s) and to consolidate any actions involving some or all of the same claims against the same
11 Defendants (*e.g.*, motions under 15 U.S.C. § 78u-4(a)(3));

12 WHEREAS the undersigned counsel agree that the interests of justice and judicial economy
13 would be served by an order extending Defendants' time to respond to this Complaint;

14 NOW THEREFORE, the undersigned parties hereby stipulate as follows, subject to the
15 Court's approval;

16 1. Lead Plaintiff shall file a Consolidated Amended Complaint or elect to proceed on the
17 current complaint no later than 30 days from the date of entry of an order consolidating any actions
18 involving some or all of the same claims against the same Defendants and appointing Lead
19 Plaintiff(s) and Lead Counsel;

20 2. Defendants shall file and serve their answer or other response to any complaint on file in
21 this action no later than 30 days after the filing of the Consolidated Amended Complaint or Lead
22 Plaintiff's election to proceed on the current complaint;

23 3. Plaintiff shall file and serve his opposition to any motion filed by Defendants pursuant
24 to Paragraph 2 herein no later than 30 days after the filing of such motion;

25 4. Defendants shall file and serve their reply in support of to any motion filed by
26 Defendants pursuant to Paragraph 2 herein no later than 14 days after Plaintiff files his opposition to
27 such motion;

28 5. Service of the papers contemplated by Paragraphs 2 through 5 above shall be by

1 facsimile or email for the briefs and declarations (without exhibits) on the day of filing, and by
2 overnight delivery for a complete set of the papers.

3 6. No later than 30 days after Defendants file their answer, the parties shall meet and
4 confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan,
5 and shall file a joint ADR certification stipulating to the ADR process or a notice of need for ADR
6 phone conference.

7 7. No later than 45 days after Defendants file their answer, the parties shall file a Rule
8 26(f) Report and complete initial disclosures or state objections thereto in the Rule 26(f) Report.

9 8. The Case Management Conference shall take place, as previously ordered, on July 3,
10 2008. The parties shall file the Case Management Statement, as previously ordered, no later than
11 June 19, 2008.

12 DATED: May 16, 2008.

Respectfully,

GILBERT R. SEROTA
JASON M. SKAGGS
JEREMY T. KAMRAS
HOWARD RICE NEMEROVSKI CANADY
FALK & RABKIN
A Professional Corporation

By: /s/ Gilbert R. Serota
GILBERT R. SEROTA

Attorneys for Defendants WELLS FARGO &
COMPANY, WELLS FARGO FUNDS MANAGEMENT,
LLC, WELLS FARGO FUNDS TRUST, WELLS FARGO
FUNDS DISTRIBUTOR, LLC, STEPHENS, INC. AND
WELLS FARGO BANK, N.A.

21 DATED: May 16, 2008.

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Attorneys for Plaintiff ARNOLD KREEK

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DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

I, GILBERT R. SEROTA, hereby declare pursuant to General Order 45, § X.B, that I have obtained the concurrence in the filing of this document from each of the other signatories listed above.

I declare under penalty of perjury that the foregoing declaration is true and correct. Executed on May 16, 2008, at San Francisco, California.

/s/

GILBERT R. SEROTA

IT IS SO ORDERED.

DATED: _____, 2008

THE HONORABLE WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

HOWARD
RICE
NEMEROVSKI
CANADY
FALK
& RABKIN
A Professional Corporation